UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

FÖRSTA AP-FONDEN AND DANSKE INVEST MANAGEMENT A/S, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

PLAINTIFFS,

V.

ST. JUDE MEDICAL, INC., DANIEL J. STARKS, JOHN C. HEINMILLER, ERIC S. FAIN, MICHAEL T. ROUSSEAU, AND DONALD J. ZURBAY,

DEFENDANTS.

Civil No. 12-3070 (JNE/HB)

DECLARATION OF ERIC SCHACHTER REGARDING (A) MAILING OF NOTICE OF PENDENCY OF CLASS ACTION; (B) PUBLICATION OF SUMMARY NOTICE; AND (C) REPORT ON REQUESTS FOR EXCLUSION RECEIVED

I. Eric Schachter, declare as follows:

1. I am a Vice President of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), whose Corporate Office is located in Milwaukee, Wisconsin. Pursuant to the Court's March 11, 2016 Order Granting Lead Plaintiffs' Unopposed Motion to Approve the Form and Manner of Class Notice (the "Class Notice Order"), A.B. Data was retained as the Notice Administrator¹ to supervise and administer the notice procedure in connection with the above-captioned action (the "Action"). I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

¹ Unless otherwise defined herein, all capitalized terms used herein shall have the meanings set forth in the Notice Plan attached as Exhibit C to Lead Plaintiffs' Unopposed Motion to Approve the Form and Manner of Class Notice (Dkt. No. 278) (the "Notice Plan").

MAILING OF THE NOTICE

- 2. Pursuant to the Class Notice Order and Court-approved Notice Plan, A.B. Data mailed the Notice of Pendency of Class Action (the "Notice") to potential Class Members and nominees. A copy of the Notice is attached hereto as Exhibit A.
- 3. On March 15, 2016, A.B. Data received from Class Counsel a data file that was provided by counsel for the Defendants containing 592 unique names and addresses of potential Class Members. On March 29, 2016, A.B. Data caused Notices to be sent by First-Class Mail to those 592 potential Class Members.
- 4. As in most class actions of this nature, the large majority of potential class members are beneficial purchasers whose securities are held in "street name" *i.e.*, the securities are purchased by brokerage firms, banks, institutions, and other third-party nominees in the name of the respective nominee, on behalf of the beneficial purchasers. A.B. Data maintains a proprietary database with names and addresses of the largest and most common banks, brokers, and other nominees (the "Record Holder Mailing Database"). A.B. Data's Record Holder Mailing Database is updated from time to time as new nominees are identified, and others go out of business. At the time of the initial mailing, the Record Holder Mailing Database contained 5,299 mailing records. On March 29, 2016, A.B. Data caused Notices to be sent by First-Class Mail to the 5,299 mailing records contained in the Record Holder Mailing Database.
- 5. In total, 5,891 Notices were mailed to potential Class Members and their nominees by First-Class Mail on March 29, 2016.
- 6. The Notice directed those who purchased or otherwise acquired St. Jude common stock during the Class Period (i.e., February 5, 2010 through November 20, 2012) for the beneficial interest of a person or entity other than themselves to either (a) within seven calendar

days of receipt of the Notice, request from A.B. Data sufficient copies of the Notice to forward to all such beneficial owners (and then forward the Notices to the beneficial owners within seven calendar days of receipt), or (b) within seven calendar days of receipt of the Notice, provide to A.B. Data a list of the names and addresses of all such beneficial owners. *See* Notice ¶ 22.

- 7. As of May 24, 2016, A.B. Data has received an additional 281,595 names and addresses of potential Class Members from individuals or brokerage firms, banks, institutions, and other nominees. A.B. Data has also received requests from brokers and other nominee holders for 36,681 Notices to be forwarded by the nominees to their customers. All such requests have been, and will continue to be, complied with and addressed in a timely manner.²
- 8. As of May 24, 2016, a total of 324,167 Notices have been mailed to potential Class Members and their nominees. In addition, A.B. Data has re-mailed 1,086 Notices to persons and entities whose original mailings were returned by the U.S. Postal Service ("USPS") and for whom or which updated addresses were provided to A.B. Data by the USPS or ascertained through a third-party information provider to which A.B. Data subscribes.

PUBLICATION OF THE SUMMARY NOTICE

9. In accordance with Paragraph 7 of the Notice Plan, A.B. Data caused the Summary Notice of Pendency of Class Action (the "Summary Notice") to be published in *Investor's Business Daily* and released electronically via PR Newswire on April 8, 2016. Copies

² For potential Class Members identified by brokerage firms, banks, institutions, and other nominees near or after the May 13, 2016 deadline to request exclusion from the Class, A.B. Data sent the Notice along with an insert advising the potential Class Member that their name and address were only recently provided to A.B. Data by their broker and/or nominee, that certain deadlines may have passed, and that the potential Class Member should contact the Notice Administrator by telephone or email with any questions. A copy of the insert is attached hereto as Exhibit B.

of proof of publication of the Summary Notice in *Investor's Business Daily* and via PR Newswire are attached hereto as Exhibits C and D, respectively.

TELEPHONE HELP LINE

10. On or about March 29, 2016, A.B. Data established and since then has continued to maintain a case-specific, toll-free telephone help line, 1-866-905-8130, with a recorded message and live operators, to accommodate potential Class Members with questions about the Notice and the Action. The automated attendant answers the calls and presents callers with a series of choices to respond to basic questions. Callers requiring further assistance have the option to be transferred to a live operator during business hours, Monday through Friday, 9:00 a.m. to 6:00 p.m. EST.

WEBSITE

11. In accordance with Paragraph 6 of the Notice Plan, A.B. Data established a website designated for this Action, www.stjudesecuritieslitigation.com. The website includes information regarding the Action and downloadable copies of the Notice; the Order Granting Lead Plaintiffs' Motion to Certify Class, Appoint Class Representatives, and Appoint Class Counsel; the Class Notice Order, and the operative Complaint. The website became operational on March 29, 2016, and is accessible 24 hours a day, 7 days a week.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED

12. The Notice informed potential Class Members that requests for exclusion from the Class were to be mailed to the Notice Administrator postmarked no later than May 13, 2016. The Notice also set forth the information that was required to be included in each request for exclusion. As of May 24, 2016, A.B. Data has received a total of twenty-six (26) requests for exclusion from the Class. Of the twenty-six (26) requests for exclusion received, twenty-five

(25) requests were submitted timely with a postmark date on or before May 13, 2016 ("Timely Exclusion Requests"), as set forth on Exhibit E hereto, and one (1) request was submitted untimely with a postmark date after May 13, 2016, as set forth on Exhibit F hereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 24th day of May 2016.

Eric Schachter

EXHIBIT A

UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

FÖRSTA AP-FONDEN AND DANSKE INVEST MANAGEMENT A/S, Individually and on Behalf of All Others Similarly Situated,

Civil No. 12-3070 (JNE/HB)

CLASS ACTION

Plaintiffs,

v

ST. JUDE MEDICAL, INC., DANIEL J. STARKS, JOHN C. HEINMILLER, ERIC S. FAIN, MICHAEL T. ROUSSEAU, and DONALD J. ZURBAY,

Defendants.

NOTICE OF PENDENCY OF CLASS ACTION

TO: ALL PERSONS OR ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED ST. JUDE MEDICAL, INC. COMMON STOCK DURING THE PERIOD FROM FEBRUARY 5, 2010 THROUGH NOVEMBER 20, 2012, AND WHO WERE DAMAGED THEREBY (THE "CLASS").

A federal court has authorized this notice. This is not a solicitation from a lawyer.

PLEASE READ THIS NOTICE CAREFULLY AND IN ITS ENTIRETY. YOU MAY BE A MEMBER OF THE CLASS DESCRIBED HEREIN. AS SUCH, YOUR RIGHTS MAY BE AFFECTED BY A PENDING CLASS ACTION LAWSUIT. THIS NOTICE ADVISES YOU OF YOUR OPTIONS REGARDING THE CLASS ACTION.

PLEASE DO NOT CALL OR WRITE THE COURT. IF YOU HAVE ANY QUESTIONS AFTER READING THIS NOTICE, YOU SHOULD CONTACT CLASS COUNSEL OR THE ADMINISTRATOR, AS DISCUSSED FURTHER BELOW.

This Notice is being sent pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of Minnesota (the "Court") to inform you (a) of a class action lawsuit that is now pending in the Court under the above caption (the "Action") against St. Jude Medical, Inc. ("St. Jude") and the individual defendants, officers of St. Jude; and (b) that the Action has been certified by the Court to proceed as a class action on behalf of the Class, as defined in paragraph 1 below.

1. On December 22, 2015, the Court entered an Order certifying the following Class:

All persons or entities who purchased or otherwise acquired St. Jude Medical, Inc. common stock during the period from February 5, 2010 through November 20, 2012 (the "Class Period"), and who were damaged thereby.

Excluded from the Class are:

- (i) Defendants; (ii) members of the immediate family of each of the Individual Defendants; (iii) any person who was an executive officer and/or director of St. Jude during the Class Period; (iv) any person, firm, trust, corporation, officer, director, or any other individual or entity in which any Defendant has a controlling interest or which is related to or affiliated with any of the Defendants; and (v) the legal representatives, agents, affiliates, heirs, successors-in-interest or assigns of any such excluded party.
- 2. This Notice is directed to you because you may be a member of the Class. If you are a member of the Class, your rights will be affected by this Action. If you do not meet the Class definition, this Notice does not apply to you. If you are uncertain whether you are a member of the Class, contact Class Counsel listed in paragraph 16 below, or your own attorney.
- 3. This Notice is <u>not</u> an admission by Defendants or an expression of any opinion by the Court as to the merits of the Action, or a finding by the Court that the claims asserted by Class Representatives¹ in this Action are valid. This Notice is intended solely to inform you of the pendency of this Action and of your rights in connection with it, including the right to request exclusion from the Class. There is no settlement or monetary recovery at this time. Defendants have denied Class Representatives' claims and contend that they are not liable for the harm alleged by Class Representatives.
- 4. The Class definition may be subject to change by the Court pursuant to Rule 23 of the Federal Rules of Civil Procedure.

¹The Court-appointed Class Representatives are Första AP-fonden and Danske Invest Management A/S.

DESCRIPTION AND STATUS OF THE LAWSUIT

- 5. This is a securities class action against Defendants for alleged violations of the federal securities laws during the Class Period. Lead Plaintiffs allege that Defendants issued false and misleading statements during the Class Period that understated and misrepresented the severity of known, undisclosed problems with St. Jude's older generation of silicone-insulated cardiac leads, including electrical malfunctions and that the silicone-insulated leads suffered from premature wear and protruding wires, defects that would inhibit the leads' ability to deliver life-saving electric shocks. Lead Plaintiffs also allege that Defendants issued false and misleading statements touting the purported improvements and successes of St. Jude's newer generation of high-voltage cardiac leads, particularly a lead named Durata, which was coated with a proprietary insulation called "Optim," instead of silicone. Defendants deny all of the allegations of wrongdoing asserted in the Action and deny any liability whatsoever to any members of the Class.
- 6. Defendants moved to dismiss the complaint. On March 10, 2014, the Court granted in part and denied in part Defendants' motion to dismiss. Thereafter, on April 23, 2014, Defendants filed an Answer denying all material surviving allegations of the First Amended Complaint and asserting certain defenses. Please note that this Notice does not describe all claims and defenses asserted by the parties. The section entitled "Where You Can Find Additional Information" describes the process by which you can obtain additional information about the Action and the claims and defenses asserted.
- 7. On September 4, 2015, Lead Plaintiffs filed their motion for class certification, which Defendants opposed on October 7, 2015. On December 22, 2015, the Court issued an Order granting Lead Plaintiffs' motion, certifying the Class, appointing Lead Plaintiffs as class representatives, and appointing Lead Counsel as lead class counsel. The Court's order certifying the Class does not guarantee Class Members will receive money or benefits; that will be decided later in the lawsuit.
- 8. No court has made a ruling on the merits of Lead Plaintiffs' allegations or on Defendants' denials and defenses. The litigation is ongoing.

YOUR RIGHTS AS A CLASS MEMBER

- 9. A class action is a type of lawsuit in which one or several individuals or entities prosecute claims on behalf of all members of a group of similarly situated persons and entities to obtain monetary or other relief for the benefit of the entire group. Class actions avoid the necessity of each member of a class having to file his, her, or its own separate lawsuit to obtain relief. Class actions are used to decide legal and factual issues that are common to all members of a class.
- 10. If you purchased or otherwise acquired St. Jude common stock during the period from February 5, 2010, through November 20, 2012, and were damaged thereby, and you are not excluded by definition from the Class, you are a member of the Class. If you are a member of the Class, you have the right to decide whether to remain a member of the Class. If you are a member of the Class and wish to be excluded from the Class, you must request exclusion in accordance with the procedures set forth in paragraph 12 below. If you want to remain a member of the Class, you do not need to do anything at this time other than to retain your documentation reflecting your transactions in St. Jude common stock during the Class Period as discussed below in paragraph 11. Your decision is important for the following reasons:
 - a. If you choose to remain a member of the Class, you will be bound by all past, present, and future orders and judgments in the Action, whether favorable or unfavorable. If any money is awarded to the Class, either through a settlement with Defendants or a judgment of the Court after a trial, you may be eligible to receive a share of that award. However, if you remain a member of the Class, you may not pursue a lawsuit on your own behalf with regard to any of the issues in this Action. Pursuant to Rule 23(e)(4) of the Federal Rules of Civil Procedure, it is within the Court's discretion whether to allow a second opportunity to request exclusion from the Class if there is a settlement or judgment in the Action after a trial. Please note that if you remain a member of the Class, you will not be personally responsible for Class Counsel's attorneys' fees or costs. Class Counsel have agreed to represent the Class on a contingent-fee basis, which means that they will be awarded fees and costs to be approved by the Court only if they succeed in obtaining a recovery from one or more Defendants. Any attorneys' fees for Class Counsel will be awarded by the Court from the settlement or judgment, if any, obtained on behalf of the Class. As a member of the Class, you will be represented by Class Counsel. Alternatively, you may remain a member of the Class and elect to be represented by counsel of your own choosing. If you do retain separate counsel, you will be responsible for that attorney's fees and expenses, and that attorney must enter an appearance on your behalf by filing a Notice of Appearance with the Court and mailing it to Class Counsel at the addresses set forth in paragraph 16 below on or before May 13, 2016.
 - b. <u>If you choose to be excluded from the Class</u>, you will not be bound by any orders or judgments in this Action, nor will you be eligible to share in any recovery that might be obtained in this Action. You will retain any right you have to individually pursue any legal rights that you may have against any Defendants with respect to the claims asserted in the Action. Please refer to paragraphs 12-15 below if you would like to request exclusion from the Class.

11. Members of the Class will be eligible to participate in any recovery that might be obtained in the Action. While this Notice is not intended to suggest any likelihood that Class Representatives or members of the Class will obtain any recovery, should there be a recovery, members of the Class will be required to support their requests to participate in the distribution of the recovery by demonstrating their membership in the Class and documenting their purchases, acquisitions, and sales of St. Jude common stock. *For this reason, please be sure to keep all records of your transactions in this security*.

HOW TO BE EXCLUDED FROM THE CLASS

12. To exclude yourself from the Class, you must send a letter by First-Class Mail stating that you "request exclusion from the Class in Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc., Civil No. 12-3070 (JNE/HB) (D. Minn.)." Your request must state your full name, address, and telephone number and be signed. If you are signing on behalf of a Class member (such as an estate, corporation, or partnership), please indicate your full name and the basis of your authority to act on behalf of the Class member. Your request for exclusion must also state the amount of St. Jude common stock purchased, acquired, and/or sold during the Class Period, as well as the dates and prices of each such purchase, acquisition, and/or sale. You must mail your exclusion request, postmarked no later than May 13, 2016, to:

Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc. EXCLUSIONS c/o A.B. Data, Ltd.

P.O. Box 173010 Milwaukee, WI 53217

- 13. You cannot exclude yourself from the Class by telephone, facsimile, or email. Requests for exclusion that do not comply with the above requirements will be invalid, unless otherwise accepted by the Court, subject to any objections of the parties to be resolved by the Court.
- 14. Do not request exclusion if you wish to participate in this Action as a member of the Class.
- 15. If you properly request exclusion from the Class, you will not be bound by any orders or judgments in this Action, but you also will not be eligible to share in any recovery that might be obtained in this Action. If you properly request exclusion, you will be entitled to pursue an individual lawsuit, claim, or remedy, if available, which you may have, at your own expense. Please note, if you decide to exclude yourself from the Class, you may be time-barred from asserting the claims covered by the Action by a statute of repose.

CLASS COUNSEL

16. The Court appointed the law firms of Kessler Topaz Meltzer & Check, LLP and Motley Rice LLC as Class Counsel. If you have any questions concerning the matters raised in this Notice, you may contact Class Counsel, as follows:

Gregory M. Castaldo, Esq. Joshua E. D'Ancona, Esq. KESSLER TOPAZ MELTZER & CHECK, LLP

280 King of Prussia Road Radnor, PA 19087

Telephone: 610-667-7706 Facsimile: 610-667-7056

www.ktmc.com

Gregg S. Levin, Esq. Joshua C. Littlejohn, Esq. MOTLEY RICE LLC 28 Bridgeside Blvd. Mt. Pleasant, SC 29464 Telephone: 843-216-9000 Facsimile: 843-216-9450 www.motleyrice.com

17. As noted above, unless you elect to retain your own personal lawyer, if you remain in the Class, you will not have any direct obligations to pay the costs of the litigation. If there is a recovery by the Class in this Action, all costs and expenses of the Action, including Class Counsel's attorneys' fees, will be paid from that recovery in an amount approved by the Court.

PLEASE KEEP YOUR ADDRESS CURRENT

18. To assist the Court and the parties in maintaining accurate lists of Class members, you are requested to mail notice of any changes in your address to:

Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc.

c/o A.B. Data, Ltd. P.O. Box 173010 Milwaukee, WI 53217

19. If this Notice was forwarded to you by the postal service, or if it was otherwise sent to you, at an address that is not current, you should immediately contact the Administrator, A.B. Data, Ltd., at the address above or by calling the Administrator toll-free at 866-905-8130 and providing them with your correct address. If the Administrator does not have your correct address, you may not receive notice of important developments in this Action.

WHERE YOU CAN FIND ADDITIONAL INFORMATION

- 20. This Notice gives only a summary of the lawsuit and the claims asserted by Class Representatives. For more detailed information regarding the Action, you may contact Class Counsel or visit www.stjudesecuritieslitigation.com.
- 21. Complete copies of the pleadings, orders, and other documents filed in this Action are available at http://www.pacer.gov or at the office of the Clerk of the Court, United States District Court for the District of Minnesota, 300 South Fourth Street, Minneapolis, MN 55415, under Civil Action No. 0:12-cv-03070.

PLEASE DO NOT CALL OR WRITE THE COURT OR CLERK OF THE COURT REGARDING THIS NOTICE.

NOTICE TO SECURITIES BROKERS AND OTHER NOMINEES

22. If, for the beneficial interest of any person or entity other than yourself, you purchased or otherwise acquired St. Jude common stock during the period from February 5, 2010 through November 20, 2012, you MUST EITHER: (i) WITHIN SEVEN CALENDAR DAYS of receipt of this Notice, request from the Administrator sufficient copies of the Notice to forward to all such beneficial owners and WITHIN SEVEN CALENDAR DAYS of receipt of those Notices forward them to all such beneficial owners; or (ii) WITHIN SEVEN CALENDAR DAYS of receipt of this Notice, provide a list of the names and addresses of all such beneficial owners to the Administrator at *Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc.*, Attn: Fulfillment Department, c/o A.B. Data, Ltd., 3410 West Hopkins Street, P.O. Box 173010, Milwaukee, WI 53217. If you choose the first option, YOU MUST send a statement to the Administrator confirming that the mailing was made and YOU MUST retain your mailing records for use in connection with any further notices that may be provided in the Action. If you choose the second option, the Administrator will send a copy of the Notice to the beneficial owners. Upon FULL AND TIMELY compliance with these directions, such nominees may seek reimbursement of their reasonable expenses actually incurred by providing the Administrator with proper documentation supporting the expenses for which reimbursement is sought.

DATED: MARCH 29, 2016

BY ORDER OF THE COURT
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

QUESTIONS? CALL 866- 905-8130 OR VISIT <u>WWW.STJUDESECURITIESLITIGA</u>TION.COM

PAGE 4 OF 4

ST. JUDE CLASS ACTION C/O A.B. DATA, LTD. P.O. BOX 173010 MILWAUKEE, WI 53217

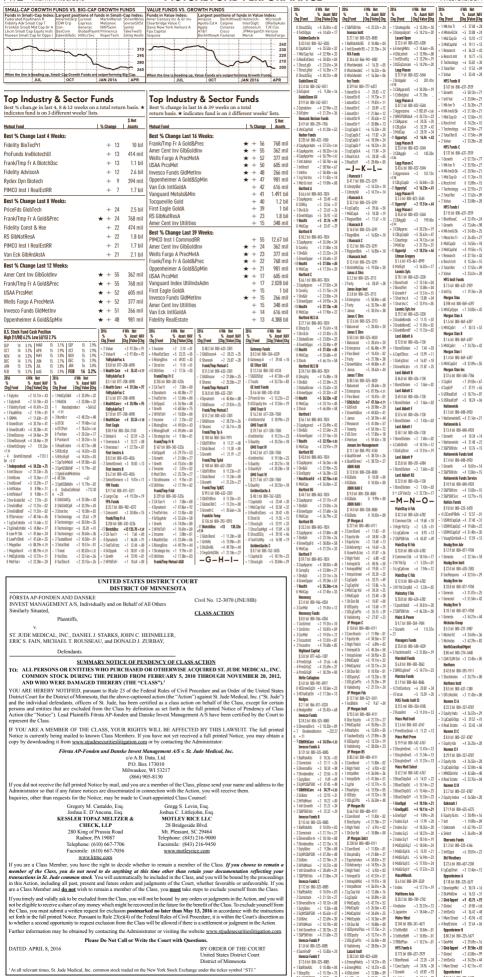
COURT-APPROVED NOTICE REGARDING FÖRSTA AP-FONDEN AND DANSKE INVEST MANAGEMENT A/S V. ST. JUDE MEDICAL, INC.

EXHIBIT B

A.B. Data, Ltd., as Notice Administrator for this Action, was recently provided with your name and address by your broker and/or nominee as a potential Class Member. Pursuant to Court Order, on March 29, 2016, A.B. Data mailed a copy of the enclosed Notice of Pendency of Class Action to brokers and nominees who may have purchased or otherwise acquired St. Jude Medical, Inc. common stock during the relevant period on behalf of beneficial owners. The Notice informed those brokers and nominees that (a) within seven (7) calendar days of receipt of the Notice they were to request from A.B. Data sufficient copies of the Notice to forward to all beneficial owners, and within seven (7) calendar days of receipt of those Notices, forward them to all such beneficial owners; or (b) within seven (7) calendar days of receipt of the Notice, provide a list of the names and addresses of all such beneficial owners to A.B. Data.

As noted above, A.B. Data only recently received your name and address in connection with this matter. Please note that because of the delay in our receipt of your name and address, you may be receiving this Notice after certain deadlines have passed. If you have questions, please contact us at 866-905-8130 or info@stjudesecuritieslitigation.com.

EXHIBIT C



If you are a Class Member, you have the right to decide whether to remain a member of the Class. If you choose to remain a member of the Class, proved the right to decide whether to remain a member of the Class, proved not need to do anything at this time other than retain your documentation reflecting your transaction in St. Jude common stock. You will automatically be included in the Class, and you will be bound by the proceedings in this Action, including all past, present and future orders and judgments of the Court, whether favorable or unfavorable. If you are a Class Member and do not win to remain a member of the Class, you mugat take steps to excluded yourself from the Class.

If you timely and validly ask to be excluded from the Class, you will not be bound by any orders or judgments in the Action, and you not be eligible to receive a share of any money which might be recovered in the future for the benefit of the Class. To exclude yourself the Class, you must submit a written request for exclusion posturated no later than May 13, 2016 in a accordance with the instruct set forth in the full printed Notice. Pursuant to Rule 23(e)(4) of the Federal Rules of Civil Procedure, it is within the Court's discretic to whether a second opportunity to request exclusion from the Class will be analowed if there is a selectment or judgment in the Action in the Class will be allowed if there is a selectment or judgment in the Action

Further information may be obtained by contacting the Administrator or visiting the website www.stjudesecuritieslitigation.com Please Do Not Call or Write the Court with Questions.

BY ORDER OF THE COURT United States District Court District of Minnesota

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\$118 bil 800-225-5677
\$18 bil

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At all relevant times, St. Jude Medical, Inc. common stock traded on the New York Stock Exchange under the ticker symbol "STJ."

EXHIBIT D



(http://www.prnewswire.com/)



Kessler Topaz Meltzer & Check, LLP and Motley Rice LLC Announce Pendency of Class Action on Behalf of Purchasers of St. Jude Medical, Inc. Common Stock

Apr 08, 2016, 09:00 ET from Kessler Topaz Meltzer & Check, LLP and Motley Rice LLC (http://www.prnewswire.com/news/kessler+topaz+meltzer+%27and%27+check% 2C+llp+and+motley+rice+llc)

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MINNEAPOLIS, April 8, 2016 / PRNewswire / --

UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

FÖRSTA AP-FONDEN AND DANSKE
INVEST MANAGEMENT A/S, Individually and on Behalf of All Others Similarly Situated,
Plaintiffs,
v.
ST. JUDE MEDICAL, INC., DANIEL J.
STARKS, JOHN C. HEINMILLER, ERIC S.
FAIN, MICHAEL T. ROUSSEAU, and
DONALD J. ZURBAY,
Defendants.

SUMMARY NOTICE OF PENDENCY OF CLASS ACTION

ALL PERSONS OR ENTITIES WHO PURCHASED OR OTHERWISE ACQUIRED ST. JUDE TO: MEDICAL, INC. COMMON STOCK DURING THE PERIOD FROM FEBRUARY 5, 2010 THROUGH NOVEMBER 20, 2012, AND WHO WERE DAMAGED THEREBY (THE "CLASS").¹

YOU ARE HEREBY NOTIFIED, pursuant to Rule 23 of the Federal Rules of Civil Procedure and an Order of the United States District Court for the District of Minnesota, that the above-captioned action (the "Action") against St. Jude Medical, Inc. ("St. Jude") and the individual defendants, officers of St. Jude, has been certified as a class action on behalf of the Class, except for certain persons and entities that are excluded from the Class by definition as set forth in the full printed Notice of Pendency of Class Action (the "Notice"). Lead Plaintiffs Första AP-fonden and Danske Invest Management A/S have been certified by the Court to represent the Class.

IF YOU ARE A MEMBER OF THE CLASS, YOUR RIGHTS WILL BE AFFECTED BY THIS LAWSUIT. The full printed Notice is currently being mailed to known Class Members. If you have not yet received a full printed Notice, you may obtain a copy by downloading it from www.stjudesecuritieslitigation.com or by contacting the Administrator:

Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc.

c/o A.B. Data, Ltd.

P.O. Box 173010

Milwaukee, WI 53217

(866) 905-8130

If you did not receive the full printed Notice by mail, and you are a member of the Class, please send your name and address to the Administrator so that if any future notices are disseminated in connection with the Action, you will receive them.

Inquiries, other than requests for the Notice, may be made to Court-appointed Class Counsel:

Gregory M. Castaldo, Esq. Joshua E. D'Ancona, Esq.

Gregg S. Levin, Esq. Joshua C. Littlejohn, Esq.

KESSLER TOPAZ MELTZER & CHECK, LLP

MOTLEY RICE LLC

280 King of Prussia Road

28 Bridgeside Blvd.

Radnor, PA 19087

Mt. Pleasant, SC 29464

Telephone: (610) 667-7706

Telephone: (843) 216-9000

Facsimile: (610) 667-7056

Facsimile: (843) 216-9450

www.ktmc.com

www.motleyrice.com

If you are a Class Member, you have the right to decide whether to remain a member of the Class. If you choose to remain a member of the Class, you do not need to do anything at this time other than retain your documentation reflecting your transactions in St. Jude common stock. You will automatically be included in the Class, and you will be bound by the proceedings in this Action, including all past, present and future orders and judgments of the Court, whether favorable or unfavorable. If you are a Class Member and do not wish to remain a member of the Class, you must take steps to exclude yourself from the Class.

If you timely and validly ask to be excluded from the Class, you will not be bound by any orders or judgments in the Action, and you will not be eligible to receive a share of any money which might be recovered in the future for the benefit of the Class. To exclude yourself from the Class, you must submit a written request for exclusion **postmarked no later than May 13, 2016** in accordance with the instructions set forth in the full printed Notice. Pursuant to Rule 23(e)(4) of the Federal Rules of Civil Procedure, it is within the Court's discretion as to whether a second opportunity to request exclusion from the Class will be allowed if there is a settlement or judgment in the Action.

Further information may be obtained by contacting the Administrator or visiting the website www.stiudesecuritieslitigation.com.

Please Do Not Call or Write the Court with Questions.

DATED: APRIL 8, 2016 BY ORDER OF THE COURT

United States District Court

District of Minnesota

Contact – Gregory M. Castaldo, Esq. or Joshua E. D'Ancona, Esq. (610) 667-7706 and Gregg S. Levin, Esq. (843) 216-9000

¹ At all relevant times, St. Jude Medical, Inc. common stock traded on the New York Stock Exchange under the ticker symbol "STJ."

To view the original version on PR Newswire, visit:http://www.prnewswire.com/news-releases/kessler-topaz-meltzer--check-llp-and-motley-rice-llc-announce-pendency-of-class-action-on-behalf-of-purchasers-of-st-jude-medical-inc-common-stock-300245017.html

SOURCE Kessler Topaz Meltzer & Check, LLP and Motley Rice LLC

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Check the box to include the list of links referenced in the article.

EXHIBIT E

Timely Exclusion Requests

ı	
1.	Jerome A. and Marlene M. Anderson
	Woodbury, MN
2.	James Greg Aslakson
	Prescott, WI
3.	Horace R. and Mary L. Baker
	Brentwood, TN
4.	Pamela K. Blossom Revocable Trust
	Pamela K Blossom, TTEE
	Columbia, MO
5.	Charles C. Blossom, Jr. Revocable Trust
	Charles C. Blossom, Jr., TTEE
	Columbia, MO
6.	Janice K. Crowley
	Jersey Village, TX
7.	Doris Doull
	Shrewsbury, MA
8.	Allen Edwin Fleury
	Huber Heights, OH
9.	William Golombisky
	Corunna, MI
10.	Edith L. Grunwald
	St. Louis, MO
11.	James Garth and Mary Anne Hayward
	Medicine Hat, Alberta, Canada
12.	Katherine Hendrick
	Felda, FL
13.	Donald Lee Lueker
	Otterville, IL
14.	Joan McDermaid
	Rockford, IL
15.	Thomas H. McFadden
10	York, PA
16.	Joanne C. Noble
47	Mount Union, PA Suzanne H. Pavlus
17.	
10	Libertyville, IL Lauren Eilen Russell
18.	Burke, VA
19.	Virginia B Rutledge
13.	Westerville, OH
20.	Paul Marius Scopton
20.	Winchester, MA
21.	Catherine R. Sleavin
۷۱.	Tacoma, WA
22.	Edward Paul and Antoinette Steinke
	Poland, OH
23.	Roger G. Stoll
_0.	Longboat Key, FL
24.	James H. Wallace Family Trust
- "	Lucy B. Wallace, TTEE
	Harvard, MA
25.	Mika Tapio Mustonen
	Helsinki, Finland
	,

EXHIBIT F

Untimely Exclusion Requests

Rudy and Mary Lauterbach
 Lake Forest, CA